

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-222(2) (NEB/TNL)

UNITED STATES OF AMERICA,

Plaintiff,

v.

AHMED YASIN ALI,

Defendant.

**GOVERNMENT'S RESPONSE TO  
DEFENDANT'S MOTION TO MODIFY  
CONDITIONS OF RELEASE**

The United States of America, by and through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, and Joseph H. Thompson, Harry M. Jacobs, Chelsea A. Walcker, and Matthew S. Ebert, Assistant United States Attorneys, respectfully submits this response to defendant's motion for modification of release conditions to permit him to travel to Somalia and India. Dkt. #131.

**I. BACKGROUND**

**A. Ali's Fraudulent Scheme and Money Laundering**

Defendant Ahmed Ali participated in a scheme to defraud the federal child nutrition program, a program designed to provide free meals to children in need. He and his co-conspirators obtained, misappropriated, and laundered millions of dollars in program funds that were intended as reimbursements for the cost of serving meals to children. They exploited changes in the program intended to ensure underserved children received adequate nutrition during the Covid-19 pandemic. Rather than feed children, Ali exploited the Covid-19 pandemic—and the resulting program changes—

to enrich himself by fraudulently misappropriating hundreds of thousands of dollars in federal child nutrition program funds.

Ali was the President and Operations Manager of Lake Street Kitchen. Lake Street Kitchen opened a Federal Child Nutrition Program site under the sponsorship of Feeding Our Future. The site was located in the JigJiga business center.

Ali and his co-conspirators claimed—falsely—that the Lake Street Kitchen site was serving hundreds of meals a day to children, seven days a week. In support of these claims, they submitted fraudulent meal counts, attendance rosters, and invoices. They claimed that Lake Street Kitchen served approximately 70,000 meals from December 2020 through April 2021. Based on these fraudulent claims, he and his co-conspirators received more than \$180,000 in Federal Child Nutrition Program funds from Feeding Our Future.

#### **B. Ali's Upcoming Trial**

On November 2, 2023, the Court set a date certain trial notice for Ali and his co-defendant, setting the trial for March 4, 2024. Dkt. #130.

## **II. ALI'S MOTION TO TRAVEL**

Ali has filed a motion seeking permission from this Court for return of his passport and to travel to Somalia and India for approximately two months. Dkt. #131. Ali requests permission to travel to accompany his brother, who lives in Somalia, to undergo cancer treatment in India.

While the government appreciates Ali's desire to assist with his brother's medical treatment, the government opposes his request to travel to Somalia and India because there are no conditions that will ensure his return to the United States to

face trial and his motion lacks important details about his proposed travel (or any details apart from the countries he proposes to travel to and the dates he intends to leave and return).

Ali has a motive to flee. He is charged with carrying out a significant fraud and faces the prospect of a lengthy prison sentence in the United States. At the same time, he has ties to abroad, including family members like his brother residing in Somalia.

Courts routinely impose travel restrictions on defendants on pretrial release, and for good reason. As a general matter, international travel poses an inherent risk that a defendant will flee the country. That risk is heightened here in light of Ali's ties to Somalia. If Ali were to travel to Somalia and India, he would be outside of the supervision of the pretrial services office and beyond the reach of American law enforcement.

### III. CONCLUSION

For the reasons set forth above, the government respectfully requests that his motion to travel be denied.

Dated: November 17, 2023

Respectfully Submitted,

ANDREW M. LUGER  
United States Attorney

BY: /s/ Harry M. Jacobs  
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